

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

PAUL BATEMAN

)

) Docket No.: 20-cr-10012-IT-1

)

)

**ASSENTED TO MOTION TO CANCEL FEBRUARY 11, 2021 RULE 11 HEARING AND
REQUEST FOR A STATUS CONFERENCE**

Comes now, Paul Bateman, through undersigned counsel, and moves this Court for its order cancelling the presently scheduled Rule 11 hearing on February 11, 2021. The parties further request a status conference for the parties with the court **not sooner than 15 days from this date**. Counsel has conferred with the government and the government assents to this change in event. Since the request to schedule this matter for a Rule 11 hearing, counsel for Mr. Bateman became aware of potential concerns regarding the constitutionality of the search warrant in this case. Mr. Bateman has requested additional discovery from the government regarding these concerns. Mr. Bateman will seek to file this request under seal consistent with the protective order in this case. The parties request for a status date not sooner than 15 days from this date would permit the government to review and respond within the allotted 14 days from Mr. Bateman's request.

For all these reasons, Mr. Bateman respectfully requests that the court cancel the presently scheduled Rule 11 hearing and schedule a status conference not sooner than 15 days from this date so that the parties may discuss these matters and further scheduling of this case before the court.

Respectfully submitted,

PAUL BATEMAN

By his Attorney,

/s/ Brendan Kelley

Brendan Kelley

B.B.O.: 569054

Assistant Federal Public Defender

Federal Public Defender Office

P.O. Box 51268

Boston, MA 02205

Tel: 617-223-8061

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 3, 2021.

/s/ Brendan Kelley

Brendan Kelley